

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

**JOSÉ CRUZ KERCADO, et al.**

*Plaintiffs*

**v.**

**COMMONWEALTH OF P.R., et al.**

*Defendants*

**CIVIL NO: 16-2748 (ADC)**

**MOTION TO WITHDRAW AS ATTORNEY OF RECORD**

**TO THE HONORABLE COURT:**

**COME NOW**, Co-Defendants, the Commonwealth of Puerto Rico, the Puerto Rico Police Department and the Puerto Rico Department of Leisure and Sports, without submitting to this Honorable Court's jurisdiction or waiving any affirmative defense, through the undersigned Attorneys, and respectfully **STATE** and **PRAY** as follows:

1. The Undersigning Attorney has been invited to join the Puerto Rico Insurance Commissioner's workforce, position that has been graciously accepted.
2. Notwithstanding the above, Defendants will continue to be represented by sister counsel Idza Díaz Rivera who is aware of all Court proceedings.
3. Therefore, the Undersigned very respectfully requests this Honorable Court for leave to withdraw as Counsel in the case at bar.

**WHEREFORE**, Defendants very respectfully request from this Honorable Court to take notice of all of the above and **GRANT** the Undersigning Attorney leave to withdraw as counsel for Defendants, along with any other relief that is deemed available in law.

Leave to Withdraw as Counsel

Case No. 16-2748

I HEREBY CERTIFY that on this same date, I have electronically filed the foregoing with the Clerk of the Court using CM/ECF system, which will send notification of such filing to all Attorneys of record.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 14<sup>th</sup> day of March, 2017.

**WANDA VÁZQUEZ GARCED**

Secretary of Justice

**WANDYMAR BURGOS VARGAS**

Acting Deputy Secretary

General Litigation Office and Acting

**SUSANA PENAGARICANO BROWN**

Acting Director

Federal Litigation and Bankruptcy Division

**S/IVÁN J. SOLARES NÚÑEZ**

**Iván José Solares Núñez**

U.S.D.C. No.: 302210

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